

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MONSANTO COMPANY, PHARMACIA,  
LLC, and SOLUTIA, INC.,

CASE NO: 4:23-cv-00204-HEA

### **CONSENT MOTION FOR EXTENSION OF TIME**

Defendants General Electric Co. (“GE”), Paramount Global (“Paramount”), Kyocera AVX Components Corporation (“KAVX”), Cornell-Dubilier Electronics, Inc. (“CDE”), and The Gillette Company, LLC (“Gillette”) (together, “Moving Defendants”), with consent of counsel for Plaintiffs Monsanto Company, Pharmacia, LLC, and Solutia, Inc. (“Plaintiffs”), respectfully move this Court for an extension of time within which to answer or otherwise respond to Plaintiffs’ First Amended Petition (ECF No. 4). In support of this motion, the Moving Defendants state as follows:

1. Defendant GE removed this action from the Circuit Court of St. Louis County, Missouri to this Court pursuant to 28 U.S.C. § 1442(a)(1) on February 20, 2023.
2. On February 27, 2023, this Court Granted the Moving Defendants' first Consent Motion for Extension of Time to respond to Plaintiffs removed First Amended Petition in this Court. (ECF No.14.) Defendants' current deadline for response, as extended, is March 31, 2023.

3. Plaintiffs filed their Motion to Remand on March 21, 2023. (ECF No. 52.)

4. Plaintiffs' counsel has consented to the Moving Defendants' requests for a further extension of time to May 1, 2023, within which to answer or otherwise respond to the First Amended Petition in this Court.

5. No party will be prejudiced by this extension.

WHEREFORE, the Moving Defendants respectfully request an extension of time to May 1, 2023, within which to answer or otherwise respond to the First Amended Petition (ECF No. 4).

Dated: March 28, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2023, the foregoing was served on all counsel of record via this Court's electronic filing system.

/s/ Gerard T. Carmody